

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

DOROTHY VILLA
5919 High Gate Drive
Baltimore, MD 21215

v.

LOWE'S HOME CENTERS, LLC
1605 CURTIS BRIDGE RD
WILKESBORO NC 28697

SERVE Resident Agent:
CSC-LAWYERS INCORPORATING
SERVICE COMPANY
7 ST. PAUL STREET
SUITE 820
BALTIMORE MD 21202

Case No. CAL22-16214

CLERK OF THE
CIRCUIT COURT
2022 JUN -3 PM 2:14
PR GEO CO MD #55

COMPLAINT

Comes now, Plaintiff Dorothy Villa, by and through her attorneys, Natalie Selzer, Seann Malloy, and Malloy Law Offices, LLC to sue the Lowe's Home Centers, LLC (herein referred to as "Defendant") and for cause states:

1. Plaintiff is an adult citizen of Baltimore City, Maryland.
2. Defendant is a North Carolina Limited Liability company registered to do business in Maryland, regularly doing business in Prince George's County at their stores located at 16301 Heritage Blvd., Bowie, MD 20716; 8755 Branch Avenue, Clinton, MD 20735; 7710 Riverdale Road, New Carrollton, MD 20784; and 10440 Campus Way South, Upper Marlboro, MD 20774.
3. This case arises out of a slip and fall occurring at 19 Texas Station Court, Lutherville Timonium, Baltimore County, Maryland 21093 known as Lowe's Home Centers (herein referred to as "Defendant's premises".)


4. At all times herein, Defendant owned, operated, managed, maintained, and otherwise controlled Defendant's premises.
5. On May 17, 2021, Plaintiff was a business invitee located on Defendant's premises when suddenly, and without warning, Plaintiff tripped on unattended merchandise that was left on the floor.
6. At all times, Plaintiff exercised due care, and did not contribute to or assume the risk of the injuries she sustained.
7. Defendant owed a duty to Plaintiff, as a business invitee and resident of premises, to operate and maintain the premises in a safe and responsible manner, so as not to cause a danger to consumers and other persons making legal use of the property, and to exercise reasonable care to warn the individuals on the premises of dangerous conditions that are actually and/or constructively known by the Defendant, but not easily discoverable.
8. That the Defendant with knowledge, actual and/or constructive, of the dangerous condition of the ground, failed to remedy the unsafe condition, allowing the ground to remain in a dangerous area with a misplaced bag of soil; and failed to warn business invitees, such as the Plaintiff, of the dangerous condition of the premises, including but not limited to failing to post warning signs, markings, cones, restrict access to the dangerous location, provide verbal warnings to indicate there was a danger posed by the condition of the ground on the premises.
9. That as a direct and proximate result of Defendant's negligence, the Plaintiff, who was at all times exercising due care, suffered severe pain and permanent injuries to her body, great pain and mental anguish, has experienced a loss of employment and wages, has been forced to expend and will continue to expend large sums of money for

hospitalization, x-rays, doctors, nurses, medical treatment, medicine for treatment, and other expenses as a result of the aforesaid injuries.

WHEREFORE, the Plaintiff Dorothy Villa, demands judgment against the Defendant LOWE'S HOME CENTERS, LLC, in the excess amount of SEVENTY-FIVE THOUSAND (\$75,000.00) dollars for economic and non-economic damages, together with the costs of this action and such other relief as is deemed

Respectfully submitted,

Malloy Law Offices, LLC

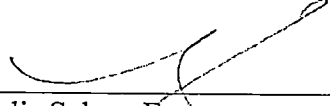


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Attorneys for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.



Natalie Selzer, Esq.